



**Eric Gonzalez**  
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**DISTRICT ATTORNEY  
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**LINO J. DE MASI**  
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November 25, 2020

Titus Mathai, Esq.

Re: People v. Jaime Reynoso  
Kings County Ind. No. 1817/2020

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: BRIAN FLYNN**

**MOS TAX: 945190**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

PLAINTIFF	DOCKET	COURT	FILED	DISPOSED	DISPOSITION
Takaisha Perry	012525/2013	Sup. Ct. Kings Cty	10-11-13	2-25-15	Settlement without admission of fault or liability

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE  
UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.**

Eric Gonzalez  
District Attorney  
Kings County